

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

| | | |
|---|---|----------------------|
| In the Matter of |) | |
| |) | |
| Connect America Fund |) | WC Docket No. 10-90 |
| |) | |
| A National Broadband Plan for Our Future |) | GN Docket No. 09-51 |
| |) | |
| Establishing Just and Reasonable Rates for Local Exchange Carriers |) | WC Docket No. 07-135 |
| |) | |
| High-Cost Universal Service Support |) | WC Docket No. 05-337 |
| |) | |
| Developing an Unified Intercarrier Compensation Regime |) | CC Docket No. 01-92 |
| |) | |
| Federal-State Joint Board on Universal Service |) | CC Docket No. 96-45 |
| |) | |
| Lifeline and Link-Up |) | WC Docket No. 03-109 |
| |) | |
| Universal Service Reform – Mobility Fund |) | WT Docket No. 10-208 |

EMERGENCY REQUEST FOR EXPEDITED TREATMENT

**PETITION OF BRANTLEY TELEPHONE COMPANY, INC., PEMBROKE
TELEPHONE COMPANY, INC., PINELAND TELEPHONE COOPERATIVE, INC.,
PUBLIC SERVICE TELEPHONE COMPANY, AND WAVERLY HALL TELEPHONE
COMPANY, LLC FOR LIMITED WAIVER OF 47 C.F.R. § 51.917(b)(7)(ii)**

Pursuant to Section 1.3 of the rules of the Federal Communications Commission (“FCC” or “Commission”),¹ Brantley Telephone Company, Inc., Pembroke Telephone Company, Inc., Pineland Telephone Cooperative, Inc., Public Service Telephone Company, and Waverly Hall Telephone Company, LLC (jointly referred to herein as “GA ILEC Petitioners”) hereby request a

¹ 47 C.F.R. § 1.3.

limited waiver of 47 C.F.R. Section 51.917(b)(7)(ii).² As explained herein, GA ILEC Petitioners seek to include amounts owed by Halo Wireless, Inc. (“Halo”) in Fiscal Year 2011 (“FY 2011”)³ in the GA ILEC Petitioners’ Carrier Base Period Revenues (“BPR”). Exclusion of the amounts owed to GA ILEC Petitioners in the BPR has a significant adverse impact on the GA ILEC Petitioners’ recovery mechanism funding, which in turn has challenged GA ILEC Petitioners by limiting their ability to invest in, and improve, their networks. GA ILEC Petitioners seek to include these amounts, which were billed to Halo but not collected by March 31, 2012, in the BPR effective July 1, 2012. The Commission has good cause to grant the GA ILEC Petitioners’ request, and furthermore grant of this waiver is squarely in the public interest and is the appropriate course of action to meet the objectives of the November 2011 *USF/ICC Transformation Order*.⁴ Likewise, the GA ILEC Petitioners’ requested relief herein is similar to the relief that the FCC recently granted, with conditions, for other similarly situated providers.⁵ Given that the FCC has acted favorably on waiver petitions filed by these carriers, the GA ILEC Petitioners believe there should be no reason to delay action on this petition and respectfully request expedited treatment.

I. BACKGROUND

GA ILEC Petitioners are rural incumbent local exchange carriers (“RLECs”) operating within rural areas of Georgia. While the GA ILEC Petitioners vary somewhat in size, they all provide high quality voice and broadband telecommunications services to their customers and are

² *Id.* at 51.917(b)(7)(ii).

³ Defined as October 1, 2010 to September 30, 2011.

⁴ See *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) (“*USF/ICC Transformation Order*”), *pets. for review denied*, *Direct Comm. Cedar Valley, et al v. FCC 11-161*, No. 11-9900 www.ca10.uscourts.gov/opinions/11/11-9900.pdf (10th Cir. filed May 23, 2014).

⁵ See *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Order, FCC 14-121 (rel. Aug. 7, 2014) (“*TDS Waiver Order*”) and WC Docket No. 10-90 *et al.*, Order, DA 15-739 (rel. June 24, 2015) (“*June 2015 Halo Waiver Order*”).

providers of last resort throughout their designated study areas in Georgia. Collectively, the GA ILEC Petitioners have been deprived of nearly \$121,773.59 that would have been included in their annual BPR but for Halo's access avoidance efforts and subsequent bankruptcy.

Brantley Telephone Company, Inc. ("Brantley"), founded in 1945, is an incumbent local exchange carrier, serving customers throughout Brantley County, Georgia, as well as small portions of Camden, Charlton, Glynn and Wayne Counties. Brantley requests a total BPR adjustment of \$13,856.98 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

Pembroke Telephone Company, Inc. ("Pembroke"), founded in 1906, has served North Bryan County and a portion of Bulloch County, located in rural southeastern Georgia for more than a century. Pembroke requests a BPR adjustment of \$22,214.34 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

Pineland Telephone Cooperative, Inc. ("Pineland"), founded in 1951, serves ten exchanges in ten different counties in east central Georgia. Pineland requests a BPR adjustment of \$16,037.07 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

Public Service Telephone Company ("Public Service"), founded in 1910, serves seven exchanges in ten different counties in west central Georgia. Public Service requests a BPR adjustment of \$59,614.47 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

Waverly Hall Telephone Company, LLC ("Waverly Hall"), founded in 1910, serves over 111 square miles in Harris County and a small part of Talbot County in west central Georgia.

Waverly Hall is wholly-owned subsidiary of US Connect Holdings, Inc. Waverly Hall requests a BPR adjustment of \$10,050.73 associated with billed, but not collected, terminating intrastate access revenues for services provided to Halo Wireless during FY 2011.

GA ILEC Petitioners all serve high-cost, rural, remote, and challenging areas of Georgia consisting of low-income areas and very low density of access lines per square mile. The GA ILEC Petitioners strive to deliver modern and reliable communications services to customers that would likely have no (or very few) alternative providers. The GA ILEC Petitioners rely on predictable and sufficient Universal Service Fund (“USF”) support and intercarrier compensation (“ICC”) mechanisms to deliver quality voice and data services at reasonable costs to consumers. Given the GA ILEC Petitioners’ remote and challenging service areas, predictable and sufficient support is imperative to their ability to continue providing quality services at reasonable costs—the series of events described herein undermine and frustrate their mission.

The events described below have produced a recurring penalty for the GA ILEC Petitioners, as they will never receive the amounts owed by Halo, *and* the negative annual impact on the GA ILEC Petitioners’ recovery mechanism funding puts them in a position where seeking relief from the Commission is the only viable option left at this point. GA ILEC Petitioners were victims of Halo’s access arbitrage scheme, the impact of which is further amplified by their inability to include the amounts billed to Halo in their BPR, leaving them deprived of both the terminating intrastate revenue that they should have collected from Halo as well as fairly assessed recovery mechanism funding going forward. GA ILEC Petitioners are utilizing the Commission’s waiver process to seek fairly assessed recovery mechanism funding so that the damage caused by

Halo's unpaid terminating intrastate intercarrier compensation charges does not reoccur every year, consistent with recent decisions by the Commission related to similarly situated providers.⁶

The GA ILEC Petitioners initially began terminating Halo's traffic in late 2010 or early 2011, and then began billing Halo for access traffic pursuant to the rates, terms and conditions set forth in the applicable access tariffs.⁷ Halo subsequently refused to pay all such access charges to each of the GA ILEC Petitioners. Halo erroneously argued that because it was a CMRS provider, all of its traffic delivered to the GA ILEC Petitioners was intraMTA CMRS and that no compensation was due for transport and termination. The numerous resulting disputes with ILECs have been documented extensively in FCC and various state commission proceedings. In the *USF/ICC Transformation Order*, the FCC rejected Halo's claim that its traffic was intraMTA CMRS, stating "[w]e clarify that a call is considered to be originated by a CMRS provider for purposes of the intraMTA rule only if the calling party initiating the call has done so through a CMRS provider;" and "we agree with NECA that the 're-origination' of a call over a wireless link in the middle of the call path does not convert a wireline-originated call into a CMRS-originated call for the purposes of reciprocal compensation and we disagree with Halo's contrary position."⁸

To further aggravate the difficulties in collecting billed intercarrier compensation fees from Halo, it appears that Halo's estate lacks sufficient assets to pay the amounts owed to the GA ILEC Petitioners that were harmed. While the GA ILEC Petitioners have filed both pre-petition and post-petition administrative claims in bankruptcy court,⁹ they cannot simply get in line and wait

⁶ See *TDS Waiver Order and June 2015 Halo Waiver Order*.

⁷ As further addressed below, Petitioners requested BPR adjustments are limited to billed, but not collected, revenues for FY 2011.

⁸ See *USF/ICC Transformation Order*, Par. 1006.

⁹ See generally Claims Register, *In re: Halo Wireless, Inc.*, Case No. 11-42464, Bkrtcy. E.D. Tex. (converted July 19, 2012) (including pre-petition claims and administrative expense (post-petition) claims filed by Petitioners).

for a reasonable settlement because the Commission required that all revenues included in calculating BPR had to be collected before March 31, 2012. Accordingly, the negative revenue impact associated with Halo's unpaid debt has ultimately created an unfair annual revenue hit for each of the GA ILEC Petitioners. The GA ILEC Petitioners have no alternative recourse but to seek waivers from the Commission, and as explained below, the Commission has good cause to grant these waivers. Additionally, consistent with the Commission's decisions in both the *TDS Waiver Order* and the *June 2015 Halo Waiver Order*, the GA ILEC Petitioners meet the requisite conditions in order to make the necessary BRP adjustments, as further outlined below.

II. GOOD CAUSE EXISTS TO GRANT GA ILEC PETITIONERS' REQUESTED WAIVER

In general, the FCC's rules may be waived for good cause shown.¹⁰ Waiver is appropriate where the "particular facts would make strict compliance inconsistent with the public interest."¹¹ The FCC may grant a waiver of its rules where the requested relief would not undermine the policy objective of the rule in question, special circumstances warrant a deviation from the general rule, and such deviation will serve the public interest.¹²

The Commission anticipated that there would be circumstances similar to this where revenues associated with FY 2011 were not able to be collected by March 31, 2012 and allowed

¹⁰ 47 C.F.R. § 1.3.

¹¹ See *AT&T Wireless Services, Inc. et al. v. Federal Communications Commission*, No. 00-1304 (D.C. Cir. 2001), citing *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("*Northeast Cellular*").

¹² See generally, *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); see also *Northeast Cellular* (D.C. Cir. 1990).

for a waiver of the March 31, 2012 deadline in its *USF-ICC Transformation Order*.¹³ Specifically, the Commission stated:

Carriers may, however, request a waiver of our rules defining the Baseline to account for revenues billed for terminating switched access service or reciprocal compensation provided in FY2011 but recovered after the March 31, 2012 cut-off as the result of the decision of a court or regulatory agency of competent jurisdiction. The adjusted Baseline will not include settlements regarding changes after the March 31, 2012 cut-off, and any carrier requesting such modifications to its Baseline shall, in addition to otherwise satisfying the waiver criteria, have the burden of demonstrating that the revenues are not already in its Baseline, including providing a certification to the Commission to that effect. Any request for a waiver should also include a copy of the decision requiring payment of the disputed intercarrier compensation. Any such waiver would be subject to the Commission's traditional "good cause" waiver standard, rather than the Total Cost Earnings Review specified below.

The overall purpose of this waiver petition is consistent with the FCC's statement above as it would allow the GA ILEC Petitioners to include revenues associated with FY 2011 that were billed but not collected due to Halo's deliberate access avoidance scheme (including Halo's bankruptcy) which were beyond the GA ILEC Petitioners' control, as outlined above.

GA ILEC Petitioners' argument for good cause is further supported by similar waiver petitions by other ILECs where the Commission has granted such petitions, subject to conditions, in its *TDS Waiver Order* and *June 2015 Halo Waiver Order*.¹⁴ Like each of the GA ILEC Petitioners, the petitioners associated with these decisions did not expect to collect the amounts they billed to Halo as a result of Halo's bankruptcy and subsequent liquidation of assets. The GA ILEC Petitioners emphasize that the loss created by Halo's refusal to pay applicable intercarrier compensation charges occurred at a time when the FCC was making monumental changes to the

¹³ See *USF/ICC Transformation Order* at footnote 1745.

¹⁴ See *TDS Waiver Order* at para. 2 and *June 2015 Halo Waiver Order* at para. 1.

USF and ICC mechanisms and therefore constitute good cause in favor of granting GA ILEC Petitioners' requested relief.

In conditionally granting the TDS petition, the Commission found that “[a]bsent such waivers, the unique combination of Halo’s alleged ‘re-origination’ of intrastate access traffic as CMRS-originated traffic, Halo’s refusal to pay access charges for that traffic, and Halo’s subsequent bankruptcy and corporate liquidation would result in significant reductions to Petitioners’ ICC recovery mechanism revenues.”¹⁵ In conditionally granting other similar Halo waiver petitions in its *June 24, 2015 Halo Waiver Order*, the Commission found that:

Petitioners have demonstrated good cause for waiver to allow them to add to their respective BPR calculations amounts reflecting intrastate access services and, in some cases, net reciprocal compensation for such traffic routed from Halo and terminated by Petitioners during FY 2011, and billed to, but not collected from, Halo. As the Commission found in the [TDS] *Halo Order*, absent such waivers, the unique combination of these circumstances would result in significant reductions to Petitioners’ ICC recovery mechanism revenues. Further, without some form of Commission action, such impact on recovery amounts would continue far into the future.¹⁶

Further, as described below, this impact on recovery amounts would continue far into the future, such that GA ILEC Petitioners would suffer ongoing harm because of Halo’s behavior, without some form of Commission action.

Grant of this waiver clearly is in the public interest. The BPR is a critical starting point to calculate Eligible Recovery and is part of the transitional recovery mechanism established by the Commission expressly to mitigate the impact of the *USF/ICC Transformation Order* on carrier revenues and investments. Grant of this limited waiver would allow the initial calculation of Eligible Recovery to accurately represent the GA ILEC Petitioners’ FY 2011 BPR. Further, grant

¹⁵ See *TDS Waiver Order* at 4.

¹⁶ See *June 2015 Halo Waiver Order* at 6.

of the limited waiver would serve the public interest in that the GA ILEC Petitioners would be able to receive the benefit of the transitional recovery mechanism to the full extent intended by the Commission and continue to provide high quality telecommunications services to their customers consistent with the FCC's National Broadband Plan, USF Reform, and IP Transition goals.

III. WAIVER CONDITIONS

In granting previous waiver petitions, the Commission implemented steps to ensure that providers had diligently pursued recovery of unpaid revenues from Halo by conditionally granting the requested waivers. Specifically, in the most recent Halo decision, the Commission found that:

Prior to the implementation of the relief granted in this Order, each Petitioner must, in order to receive such relief, certify under penalty of perjury the following:

- First, that it terminated all of the intrastate access and if applicable, reciprocal compensation traffic (compensable traffic), sent to it by Halo for termination during FY 2011 that it seeks to add to its BPR calculations. This condition will limit BPR adjustments to reflect traffic for which compensable services that were actually provided.
- Second, that it billed Halo for such compensable traffic during FY 2011 or before the close of the next regular billing cycle in Fiscal Year 2012 for the amounts to be added to BPR calculations. This condition is designed to limit BPR adjustments to those relating to revenue that Petitioners attempted to collect from Halo for the provision of compensable traffic during FY 2011.
- Third, that a court or state regulatory agency of competent jurisdiction (e.g., a state commission) has made a finding of liability against Halo regarding each category of the requested compensation for such traffic.
- Fourth, that it filed a timely claim in the Halo bankruptcy case that requests compensation for such traffic, and any BPR adjustment for a study area resulting from this Order does not exceed the terminating portion of such petitioner's bankruptcy claim for that study area. These requirements are intended to prevent Petitioners from taking actions now to increase their BPR adjustments beyond the amounts of their claims in the Halo bankruptcy case.
- Fifth, that its BPR adjustment amounts do not include any interest, late payment fees, collection fees, or attorney fees, in order to ensure that BPR adjustments are limited to revenue associated with compensable traffic, and do not include other types of revenue. In addition, such certification must confirm that the revenues supporting the requested BPR adjustments are not already included in the BPR calculations.¹⁷

¹⁷ June 2015 Halo Waiver Order at 20.

As detailed below, each GA ILEC Petitioner hereby certifies that each one meets each of the above five conditions. All GA ILEC Petitioners terminated all access traffic sent to it by Halo during FY 2011 that they seek to add to their BPR calculations and all GA ILEC Petitioners billed Halo for such compensable traffic during FY 2011.

Further, a court or regulatory agency of competent jurisdiction has made a finding of liability regarding the compensation for such traffic. On July 17, 2012, the Georgia Public Service Commission (“GPSC”) issued an order that found that Halo was delivering toll traffic to the carriers “and said toll traffic is subject to lawfully tariffed access charges.”¹⁸

Additionally, each GA ILEC Petitioner filed a timely claim in the Halo bankruptcy case requesting compensation for such traffic and the BPR adjustment for each petitioner’s study area does not exceed the terminating portion of the petitioner’s bankruptcy claim for that study area.

Finally, each GA ILEC Petitioner hereby certifies that the BPR adjustments outlined below do not include revenues that are already included in their relevant baselines, including all interstate switched access charges, and do not contain any interest, late payment fees, collection fees, or attorney fees.

IV. REQUESTED RELIEF

For the reasons stated above, pursuant to Section 1.3 of the Commission’s rule, the GA ILEC Petitioners hereby respectfully request that the Commission include the following amounts in their BPR.

¹⁸ See GPSC Order, Docket 34219, issued July 17, 2012.

GA ILEC Petitioner:

BPR Adjustment:

| | |
|--------------------------------------|-------------|
| Brantley Telephone Company, Inc. | \$13,856.98 |
| Pembroke Telephone Company, Inc. | \$22,214.34 |
| Pineland Telephone Cooperative, Inc. | \$16,037.07 |
| Public Service Telephone Company | \$59,614.47 |
| Waverly Hall Telephone Company, LLC | \$10,050.73 |

GA ILEC Petitioners request that these amounts be included retroactively in the BPR effective as of July 1, 2012. The GA ILEC Petitioners have shown good cause for the Commission to grant this limited waiver, and urge the Commission to expeditiously address the petition.

Respectfully submitted,

/s/ Donovan Strickland

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President
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/s/ Deborah Rand

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Vice President Admin and Support
US Connect / Waverly Hall Telephone Co., LLC
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Waverly Hall, GA 31831

Filed January 5, 2016

Attachments

Brantley Telephone Company

SAC - 220347

| FY 2011 | | MOUs | | | Composite Rates | | | Revenues | | |
|-----------------|--------|------------|------------|-------|-----------------|------------|--------|------------|------------|------------|
| Month | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Total |
| Oct-10 | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Nov-10 | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Dec-10 | 8,558 | 16,373 | 12,280 | 0.000 | 0.058588 | 0.030362 | \$0.00 | \$959.25 | \$372.83 | \$1,332.08 |
| Jan-11 | 16,582 | 31,722 | 23,792 | 0.000 | 0.058588 | 0.030362 | \$0.00 | \$1,858.54 | \$722.36 | \$2,580.90 |
| Feb-11 | 14,977 | 28,652 | 21,489 | 0.000 | 0.058588 | 0.030362 | \$0.00 | \$1,678.68 | \$652.46 | \$2,331.14 |
| Mar-11 | 16,582 | 31,722 | 23,792 | 0.000 | 0.058588 | 0.030362 | \$0.00 | \$1,858.54 | \$722.36 | \$2,580.90 |
| Apr-11 | 16,047 | 30,699 | 23,024 | 0.000 | 0.058588 | 0.030362 | \$0.00 | \$1,798.59 | \$699.06 | \$2,497.65 |
| May-11 | 18,969 | 36,289 | 27,217 | 0.000 | 0.058588 | 0.030362 | \$0.00 | \$2,126.09 | \$826.35 | \$2,952.44 |
| Jun-11 | 21,089 | 40,345 | 30,258 | 0.000 | 0.058588 | 0.030362 | \$0.00 | \$2,363.71 | \$918.71 | \$3,282.42 |
| Jul-11 | 10,828 | 20,714 | 15,535 | 0.000 | 0.058588 | 0.030362 | \$0.00 | \$1,213.58 | \$471.69 | \$1,685.27 |
| 8/8/2011 (pre) | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| 8/9/2011 (post) | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Sep-11 | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |

\$0.00 \$13,856.98 \$5,385.82 \$19,242.80

Total Eligible Recovery Amount (Intrastate Terminating)

\$13,856.98

Pembroke Telephone Company

SAC - 220376

| FY 2011 | MOUs | | | Composite Rates | | | Revenues | | | |
|-----------------|--------|------------|------------|-----------------|------------|------------|----------|------------|------------|------------|
| Month | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Total |
| Oct-10 | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.0000 |
| Nov-10 | 348 | 667 | 500 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$32.37 | \$16.79 | \$49.16 |
| Dec-10 | 2,581 | 4,938 | 3,704 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$239.80 | \$124.37 | \$364.17 |
| Jan-11 | 11,759 | 22,495 | 16,871 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$1,092.39 | \$566.56 | \$1,658.95 |
| Feb-11 | 24,261 | 46,412 | 34,809 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$2,253.82 | \$1,168.93 | \$3,422.75 |
| Mar-11 | 28,682 | 54,870 | 41,152 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$2,664.54 | \$1,381.94 | \$4,046.48 |
| Apr-11 | 42,265 | 80,856 | 60,642 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$3,926.43 | \$2,036.41 | \$5,962.84 |
| May-11 | 43,484 | 83,187 | 62,391 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$4,039.66 | \$2,095.14 | \$6,134.80 |
| Jun-11 | 40,607 | 77,682 | 58,262 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$3,772.34 | \$1,956.49 | \$5,728.83 |
| Jul-11 | 37,802 | 72,317 | 54,238 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$3,511.79 | \$1,821.36 | \$5,333.15 |
| 8/8/2011 (pre) | 7,333 | 14,028 | 10,521 | 0.000 | 0.048561 | 0.033581 | \$0.00 | \$681.20 | \$353.30 | \$1,034.50 |
| 8/9/2011 (post) | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Sep-11 | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |

\$0.00 \$22,214.34 \$11,521.29 \$33,735.63

Total Eligible Recovery Amount (Intrastate Terminating)

\$22,214.34

Pineland Telephone Cooperative

SAC - 220377

| FY 2011 | MOUs | | | Composite Rates | | | Revenues | | | |
|-----------------|--------|------------|------------|-----------------|------------|------------|----------|------------|------------|--------------|
| Month | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Total |
| Oct-10 | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.0000 |
| Nov-10 | 0 | 0 | 0 | 0.000 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.0000 |
| Dec-10 | 5,855 | 11,200 | 8,400 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$219.93 | \$164.95 | \$384.8888 |
| Jan-11 | 23,138 | 44,264 | 33,198 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$869.18 | \$651.88 | \$1,521.066 |
| Feb-11 | 34,208 | 65,441 | 49,081 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$1,285.01 | \$963.76 | \$2,248.7777 |
| Mar-11 | 42,543 | 81,386 | 61,039 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$1,598.09 | \$1,198.57 | \$2,796.6666 |
| Apr-11 | 45,977 | 87,956 | 65,967 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$1,727.10 | \$1,295.33 | \$3,022.4333 |
| May-11 | 51,447 | 98,420 | 73,815 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$1,932.58 | \$1,449.43 | \$3,382.0167 |
| Jun-11 | 50,802 | 97,186 | 72,890 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$1,908.35 | \$1,431.26 | \$3,339.6167 |
| Jul-11 | 48,323 | 92,444 | 69,333 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$1,815.23 | \$1,361.42 | \$3,176.6556 |
| 8/8/2011 (pre) | 11,065 | 21,167 | 15,875 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$415.63 | \$311.72 | \$727.3556 |
| 8/9/2011 (post) | 33,702 | 64,473 | 48,355 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$1,265.99 | \$949.49 | \$2,215.4856 |
| Sep-11 | 79,862 | 152,779 | 114,585 | 0.000 | 0.019636 | 0.019636 | \$0.00 | \$2,999.98 | \$2,249.98 | \$5,249.9656 |

\$0.00 \$16,037.07 \$12,027.79 \$28,064.86

Total Eligible Recovery Amount (Intrastate Terminating)

\$16,037.07

Public Service Telephone Company
SAC - 220381

| FY 2011 | MOUs | | | Composite Rates | | | Revenues | | | |
|-----------------|--------|------------|------------|-----------------|------------|------------|----------|-------------|------------|-------------|
| Month | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Total |
| Oct-10 | 0 | 0 | 0 | 0.000 | 0.00000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Nov-10 | 207 | 4,200 | 2,479 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$252.11 | \$67.26 | \$319.37 |
| Dec-10 | 1,338 | 27,196 | 16,050 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$1,632.30 | \$435.47 | \$2,067.77 |
| Jan-11 | 3,340 | 67,905 | 40,075 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$4,075.65 | \$1,087.31 | \$5,162.96 |
| Feb-11 | 4,829 | 98,189 | 57,948 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$5,893.30 | \$1,572.23 | \$7,465.53 |
| Mar-11 | 6,991 | 142,143 | 83,887 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$8,531.40 | \$2,276.04 | \$10,807.44 |
| Apr-11 | 5,306 | 107,881 | 63,667 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$6,475.02 | \$1,727.43 | \$8,202.45 |
| May-11 | 2,806 | 57,054 | 33,671 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$3,424.38 | \$913.57 | \$4,337.95 |
| Jun-11 | 3,379 | 68,703 | 40,546 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$4,123.55 | \$1,100.09 | \$5,223.64 |
| Jul-11 | 10,114 | 205,658 | 121,372 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$12,343.62 | \$3,293.07 | \$15,636.69 |
| 8/8/2011 (pre) | 4,684 | 95,238 | 56,206 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$5,716.17 | \$1,524.98 | \$7,241.15 |
| 8/9/2011 (post) | 5,855 | 119,059 | 70,265 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$7,145.95 | \$1,906.42 | \$9,052.37 |
| Sep-11 | 1 | 17 | 10 | 0.000 | 0.06002 | 0.027132 | \$0.00 | \$1.02 | \$0.27 | \$1.29 |

\$0.00 \$59,614.47 \$15,904.14 \$75,518.61

Total Eligible Recovery Amount (Intrastate Terminating)

\$59,614.47

Waverly Hall Telephone Company

SAC - 220392

| FY 2011 Month | MOUs | | | Composite Rates | | | Revenues | | | |
|------------------|--------|------------|------------|-----------------|------------|------------|----------|------------|------------|------------|
| | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Local | Intrastate | Interstate | Total |
| Oct-10 | 0 | 0 | 0 | 0.00 | 0.000000 | 0.000000 | \$0.00 | \$0.00 | \$0.00 | \$0.00 |
| Nov-10 | 5,239 | 10,022 | 7,517 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$573.88 | \$179.77 | \$753.65 |
| Dec-10 | 10,130 | 19,379 | 14,534 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$1,109.64 | \$347.61 | \$1,457.25 |
| Jan-11 | 9,350 | 17,888 | 13,416 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$1,024.27 | \$320.87 | \$1,345.14 |
| Feb-11 | 9,086 | 17,382 | 13,036 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$995.28 | \$311.79 | \$1,307.07 |
| Mar-11 | 9,576 | 18,320 | 13,740 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$1,049.00 | \$328.61 | \$1,377.61 |
| Apr-11 | 8,253 | 15,788 | 11,841 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$904.04 | \$283.20 | \$1,187.24 |
| May-11 | 8,228 | 15,741 | 11,806 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$901.36 | \$282.36 | \$1,183.72 |
| Jun-11 | 8,219 | 15,723 | 11,792 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$900.31 | \$282.03 | \$1,182.34 |
| Jul-11 | 7,771 | 14,867 | 11,150 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$851.28 | \$266.67 | \$1,117.95 |
| 8/8/2011 (pre) | 1,631 | 3,121 | 2,340 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$178.69 | \$55.98 | \$234.67 |
| 8/9/2011 (post) | 6,810 | 13,027 | 9,771 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$745.97 | \$233.68 | \$979.65 |
| Sep-11 | 7,458 | 14,268 | 10,701 | 0.00 | 0.057261 | 0.023917 | \$0.00 | \$817.01 | \$255.94 | \$1,072.95 |

\$0.00 \$10,050.73 \$3,148.51 \$13,199.24

Total Eligible Recovery Amount (Intrastate Terminating)

\$10,050.73